

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

Civil No. 18-1776 (JRT/HB)

This Document Relates to:

All Consumer Indirect Purchaser Actions

**STIPULATION OF CONSENT FOR LEAVE TO FILE
CONSUMER INDIRECT PURCHASER PLAINTIFFS'
FOURTH CONSOLIDATED AMENDED CLASS ACTION COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a)(2), Consumer Indirect Purchaser Plaintiffs (“CIPPs”) and undersigned Defendants¹ (the “Parties”) hereby stipulate and agree, subject to the approval and order of this Court as follows:

1. CIPPs may file their Fourth Consolidated Amended Class Action Complaint (“4AC”) – attached as follows:
 - a. Exhibit A: SEALED Proposed Redline Complaint;
 - b. Exhibit B: SEALED Proposed Clean Complaint;
 - c. Exhibit C: REDACTED Proposed Redlined Complaint;
 - d. Exhibit D: REDACTED Proposed Clean Complaint
2. The 4AC substitutes three new named plaintiffs— Eric Schaub (Florida), Kate Smith (Nebraska), and Sarah Isola (Nevada) —for individuals who are no longer willing to serve as class representatives. The 4AC also drops named plaintiff Anbessa Tufa (Minnesota).
3. The Parties stipulate that all previous discovery requests served on CIPPs would be deemed served on the three new class representatives and that the three new named plaintiffs will substantially complete their document productions in response to defendants’ requests within 30 days of the date of this filing.
4. The Parties further stipulate that Defendants are not required to answer the 4AC, and that all admissions and denials as to factual allegations and all affirmative defenses in Defendants’ prior answers to the Second Amended Complaint remain

¹ As CIPPs and Defendant JBS USA Food Company have reached a settlement (Dkt. No. 990), JBS USA Food Company takes no position on this stipulation.

operative.

DATED: January 4, 2022

Respectfully submitted,

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